## EXHIBIT 14

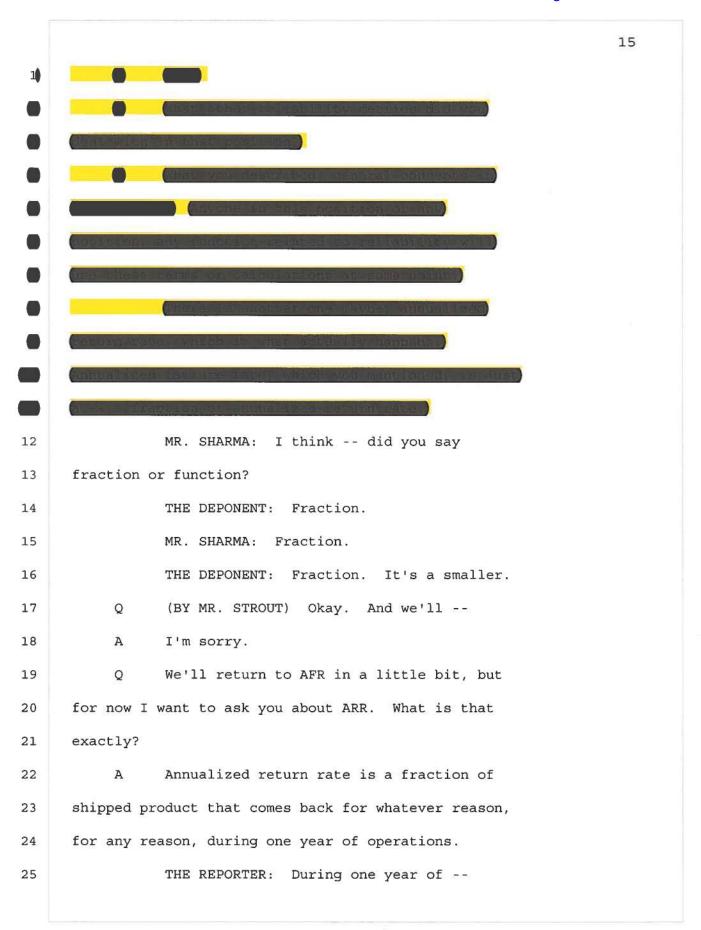
## [REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED]

UNITED STATES DISTRICT COURT	
NORTHERN DISTRICT OF CALIFORNIA	
No. 5:16-cv-00523-RMW	
IN RE SEAGATE TECHNOLOGY, LLC	
LITIGATION	
SUPERIOR COURT OF THE STATE OF CALIFORNIA	
FOR THE CITY AND COUNTY OF SAN FRANCISCO	
Case No. CGC-15-547787	
TIM POZAR and SCOTT NALICK, Individually and on Behalf of All Others Similarly situated,	
Plaintiffs,	
rs.	
SEAGATE TECHNOLOGY LLC and DOES	
Defendants.	
VIDEOTAPED DEPOSITION OF ANDREI KHURSHUDOV September 8, 2017	
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13
1
                 I was responsible for developing -- for
 2
      running projects related to big data analytics,
 3
      machine learning, and different types of exploratory
      studies.
 4
 5
           Q
                 What is machine learning?
 6
                 Machine learning term refers to the field
      of statistics, mathematics or computer science that
 7
8
      relates to algorithms or software that improve
9
      performance with experience or with time or data.
      Essentially, they learn over time.
10
11
                 Okay. And you also said you did
      exploratory studies.
12
           A
13
                 Uh-huh.
           Q
                 What does that mean?
14
15
                 Ad hoc studies, whatever I was finding to
16
      be important for the company at the time.
                 So you had the freedom to choose the
17
18
      own -- your -- the areas that you wanted to study?
19
           A
                 That's correct.
20
                 Did you work at any other position at
21
      Seagate in the past other than as chief technologist?
22
           A
                 Yes.
23
                 And what was that?
           Q
           A I started as a director of advanced
24
      reliability in 2006. Then I moved to -- my subjects
25
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14
     changed, but the next milestone I will say was a
1
 2
     general manager of Seagate Recovery Services. Then I
     worked as a senior director in different other
 3
     functions, including managing cloud research in the
 4
 5
     analytics organization.
      Q All right. Well, let's take it
 6
 7
     chronologically from your earliest position. Take a
     look at your LinkedIn profile on Page 2, please.
8
     What was your first position at Seagate?
9
         A Yes, it says senior director, worldwide
10
11
     advanced quality and reliability.
          Q What did you do in that position?
12
13
```

Khurshudov, Andrei - 09-08-2017



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24
     failure rate increases at the end of its life.
 1
 2
                (BY MR. STROUT) Let's turn back to your
     LinkedIn profile. What was your position after
 3
     senior director of quality data analytics?
 4
 5
          A
               Yes. General manager, Seagate Recovery
     Services.
 6
 7
                And you were there from June 2010 to
 8
     August 2011, correct?
 9
          A
                Uh-huh.
10
                What were your responsibilities in that
          Q
11
     position?
12
                Seagate acquired a recovery service
13
     business from outside, and I was asked to manage it
14
     and integrate it into Seagate company business wise,
     technology wise, people wise.
15
      Q What was your position after that?
16
       A Yes, senior director, cloud research and
17
18
     analytics.
      Q And you were there from August 2011 until
19
     May 2015; is that right?
20
      A Correct.
21
          Q What did you do in that position?
22
23
       A Well, as the title says, Seagate became
     interested in cloud technology and cloud products,
24
     and new organizations were formed focusing on this
25
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25
     field. And I was building and managing an
 1
 2
     organization that was responsible for doing research
 3
     work, in a way ad hoc research activities, and doing
 4
     analytics and developing analytics solutions for
 5
     Seagate.
       Q In this position, did you deal at all with
 6
     annualized failure rate?
 7
         A Yes.
 8
 9
          Q So then you also dealt with mean time
     between failure?
10
11
       A Correct.
          Q And defective parts per million?
12
         A Correct.
13
14
      Q Did you deal at all with factory yield in
     this position?
15
      A Unlikely.
16
17
                And then after that your position was, as
18
     we discussed, chief technologist, big data analytics
     and insights; is that correct?
19
20
          A
                Correct.
21
               Okay. You can put the LinkedIn profile to
     the side.
22
23
                Before you started working at Seagate --
24
     and actually, you can refer back to the LinkedIn
25
     profile if necessary -- but where did you work prior
```

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37
 1
     you please define AFR for me?
         A If you look at all the drives of a
 2
 3
      particular model, say, produced during one year, and
 4
     then you trace their future, the fraction of drives
 5
     that will come back will represent the annualized
     return rate.
 6
        Of the returns that come back, there will
 7
     be a fraction measurable, sometimes greater,
 8
9
     sometimes smaller, fraction of drives that we will --
     Seagate will call no trouble found, for example, no
10
     trouble found, which means when drives are tested
11
12
     internally, nothing wrong could be found with them,
     and it remains a question why they were returned.
13
14
          There will be another fraction that will
15
     be tested and linked to issues outside of expected
     range of stress. As I mentioned before, drives that
16
     are clearly mishandled, for example, or drives that
17
     are electrocuted by poor electric connection,
18
19
     something that could be easily discovered.
20
        In the world of the retail, what's called
21
     Disty, distribution drives, there will be some other
22
     group of drives. Sometimes they are returned without
     even being removed from the packaging, essentially.
23
     Internally this will be called buyer's remorse cases,
24
     something like that. Essentially somebody buys and
25
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38
1
     then change his mind and returns a drive even without
 2
     trying.
 3
      So depending on the application or market,
     the fraction of not true failures varies, and it
4
     could be as great as 80 percent in some cases. For
5
6
     every 100 returned drives, only 20 will be confirmed
7
     as having real problem. This is not a typical
     number, but it could be as bad as this.
8
      Q So does AFR -- that does not include no
9
     trouble found drives, right?
10
     A Uh-huh.
11
12
       Q Or drives that were returned due to
13
     buyer's remorse?
      A Uh-huh.
14
15
       Q Or drives that were mishandled?
16
      A Uh-huh.
        THE REPORTER: Can I just get you to say
17
     yes or no?
18
       THE DEPONENT: Oh, yes. Yes.
19
20
     Q (BY MR. STROUT) Okay. So -- yeah, I
21
     should -- I'll just run through those one more time
22
     just because you said uh-huh instead of yes.
        So AFR does not include drives --
23
       A Sorry.
24
        MR. SHARMA: Take your time.
25
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39
               THE VIDEOGRAPHER: Need some help?
1
               THE DEPONENT: I didn't do --
 2
        (Discussion off the record.)
3
         THE DEPONENT: Okay.
 4
5
          Q (BY MR. STROUT) All right. So AFR does
     not include drives where there is no trouble found?
6
        A Correct.
7
        Q And it does not include drives that were
8
     returned due to what you characterized as buyer's
9
     remorse?
10
      A Correct.
11
          Q And AFR also does not include drives that
12
     were misused?
13
      A I believe so.
14
15
          Q
               Does Seagate calculate AFR, you know,
16
     prior to releasing a drive?
               MR. SHARMA: Objection, lack of
17
18
     foundation.
          0
              (BY MR. STROUT) You can answer.
19
20
               THE DEPONENT: How is that --
21
               MR. SHARMA: If you know the answer --
     yeah, if you know the answer to the question --
22
          Q
23
              (BY MR. STROUT) You can answer.
24
               MR. GOLDICH: We normally just ignore
25
     them.
```

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67
     Is it 5?
1
2
              THE REPORTER: 6.
      MR. STROUT: 6, all right.
3
      I'm now marking as Exhibit 6 the document
4
5
     Bates labeled FED SEAG 0019045.
      (Exhibit 6 marked.)
6
7
     Q (BY MR. STROUT) All right. Have you seen
     this document before?
8
     A I have not seen this document before. It
9
     looks like a product manual, again typical product
10
     manual for a Seagate product.
11
      Q All right. I represent to you that this
12
     document was produced by Seagate during discovery in
13
     this case. Right there on the first page it says
14
     Product Manual, Barracuda; is that right?
15
     A Yes, correct.
16
17
      MS. MCLEAN: I'd also like to note, as I
18
     did yesterday, that this document appears to be a
     draft. It's not clear that it -- it was released to
19
20
     the public because it has redlines in it.
     Q (BY MR. STROUT) Underneath where it says
21
     Barracuda it says ST3000DM001; is that right?
22
23
      A Yes, that's correct.
     Q And this document is dated April 2011,
24
     right?
25
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68
           A Correct.
 1
 2
                 And the data sheet that we were just
      talking about, the copyright date was 2011, right?
 3
                 MR. SHARMA: Take a look at it if you need
 4
 5
      to.
                 That's correct.
 6
           A
 7
                (BY MR. STROUT) Please turn to Page
           O
      19056.
 8
                 Uh-huh. Yes.
 9
           A
10
                 Do you see on this table where it says
11
      annualized failure rate?
                 Yes, I can see.
12
           A
13
                 Okay. And there's a column on here for
14
      the ST3000 drive; is that right?
           A
                 Yes, that's correct.
15
                 And the annualized failure rate for the
16
17
      ST3000 is listed as .34 percent; is that right?
                 I can see.
18
           A
19
                 Do you know why it says .34 percent here,
20
      whereas in the data sheet we just looked at it said
21
      less than 1 percent?
22
                 MR. SHARMA: Objection, lacks foundation,
23
      calls for speculation.
           A
                 I don't know.
24
           Q
                 (BY MR. STROUT) Okay.
25
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Khurshudov, Andrei - 09-08-2017



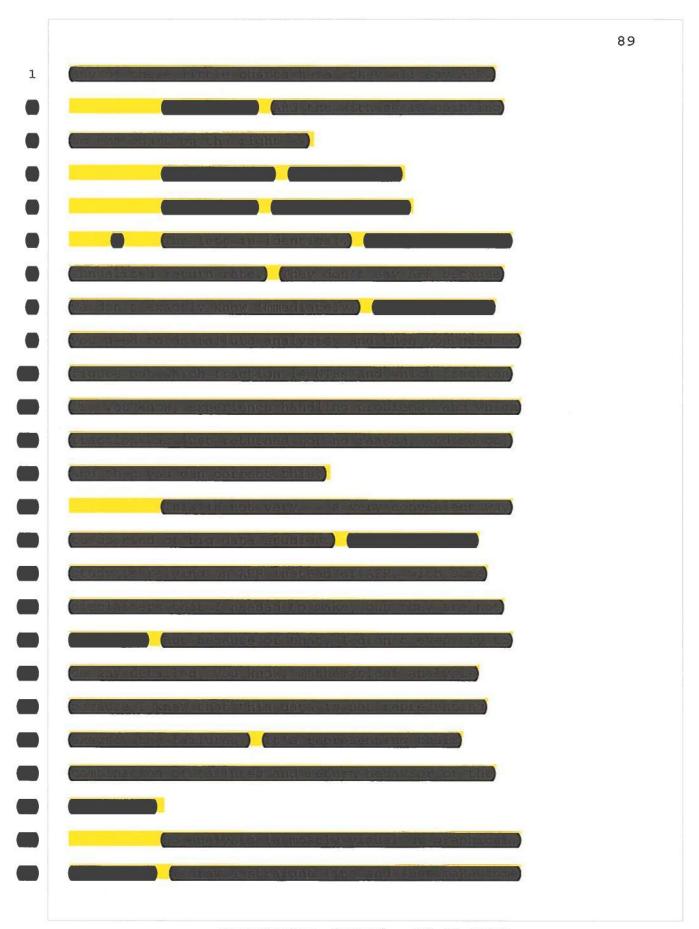
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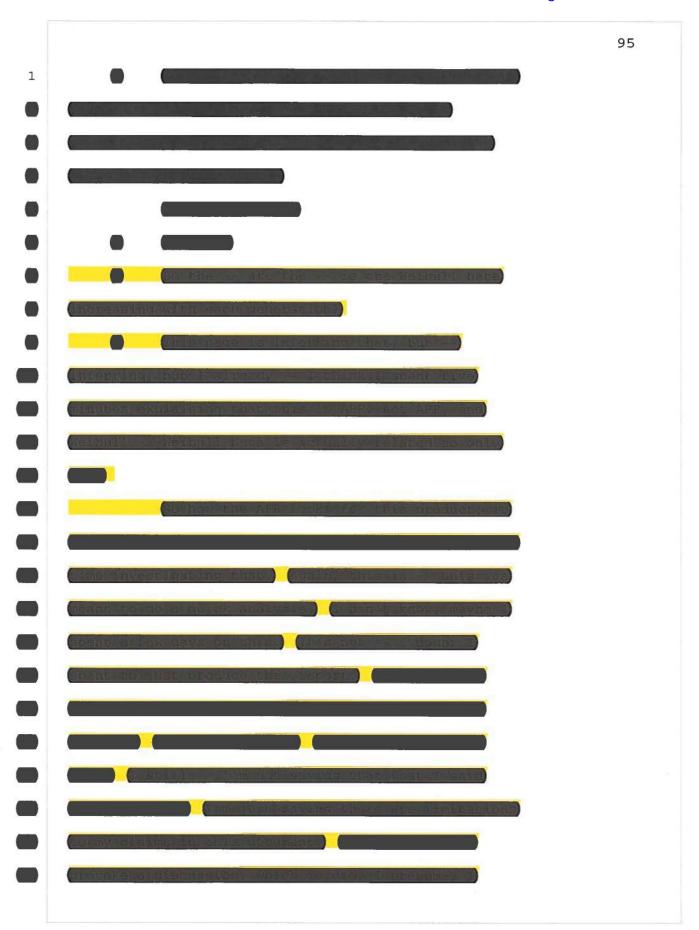
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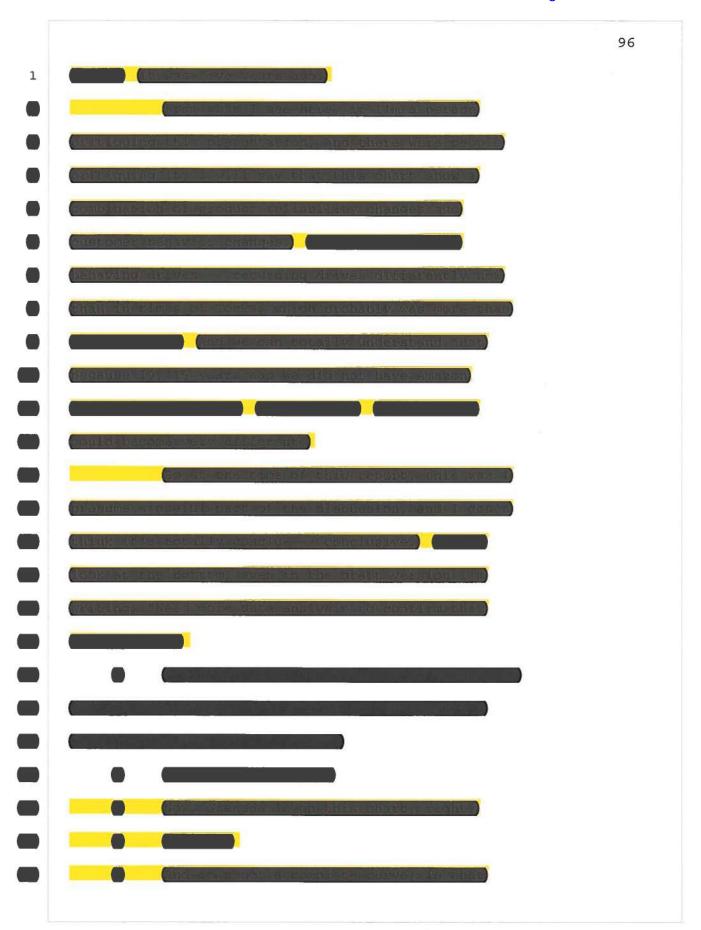
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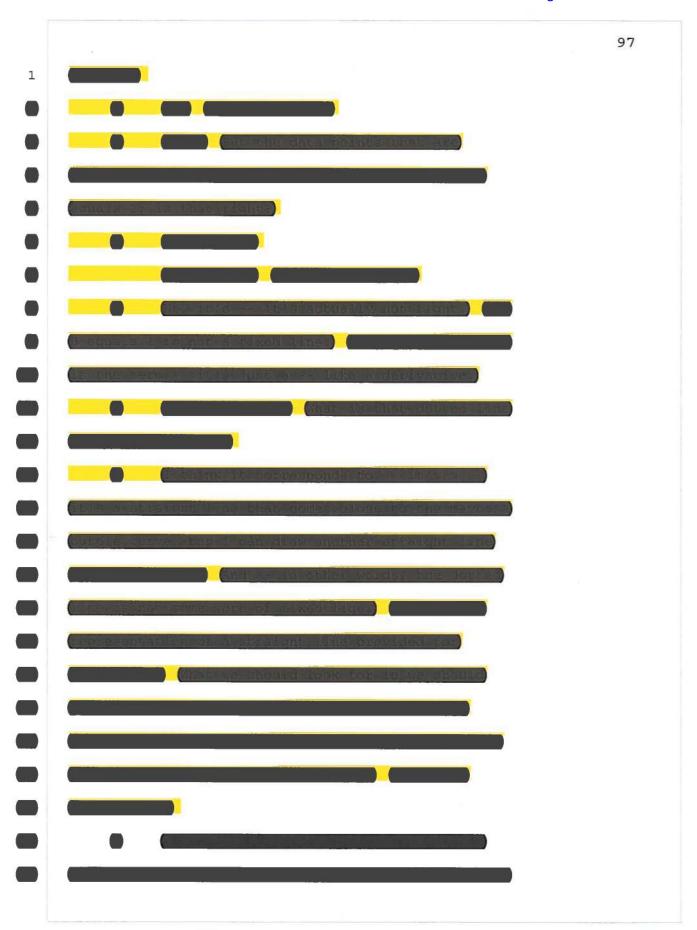
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		204
1	STATE OF COLORADO)	
2	) ss. REPORTER'S CERTIFICATE	
3	COUNTY OF DENVER )	
4	I, Pamela J. Hansen, do hereby certify that	
5	I am a Registered Professional Reporter and Notary	
6	Public within the State of Colorado; that previous to	
7	the commencement of the examination, the deponent was	
8	duly sworn to testify to the truth.	
9	I further certify that this deposition was	
10	taken in shorthand by me at the time and place herein	
11	set forth, that it was thereafter reduced to	
12	typewritten form, and that the foregoing constitutes	
13	a true and correct transcript.	
14	I further certify that I am not related to,	
15	employed by, nor of counsel for any of the parties or	
16	attorneys herein, nor otherwise interested in the	<b>6</b> 1
17	result of the within action.	
18	In witness whereof, I have affixed my	
19	signature and seal this 21st day of September, 2017.	
20	My commission expires September 3, 2018.	
21		
22	Pamela J. Hansen, CRR, RPR, RMR	
23	216 - 16th Street, Suite 600 Denver, Colorado 80202	
24		
25		